

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA)
)
)
v.) Criminal No. 3:18-cr-00075-REP
)
)
VIOREL ANTOANEL NABOIU,)
a.k.a. "LUIGI LATORZA,")
)
)
Defendant.)

**MOTION FOR ADDITIONAL ONE-LEVEL REDUCTION PURSUANT TO
U.S.S.G. § 3E1.1(b) FOR TIMELY ACCEPTANCE OF RESPONSIBILITY**

COMES NOW, the United States of America, by and through counsel and moves this Court to reduce the defendant's Total Offense Level by one additional level for acceptance of responsibility. The defendant timely informed the United States of his intention to plead guilty, permitting the Government to avoid the needless expenditure of resources associated with preparation for trial. Accordingly, the United States moves the Court to award the defendant a third one-level reduction for acceptance of responsibility pursuant to USSG § 3E1.1(b).

Respectfully submitted,

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By: /s/ Brian R. Hood
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on **January 3, 2019**, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all parties of record.

Respectfully submitted,

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

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